REMARKS/ARGUMENTS

<u>SUMMARY:</u>

Claims 1, 7, and 13 stand rejected under 35 U.S.C. § 112, second paragraph, because the Office
Action asserts that the words 'context' and 'shortcut' are indefinite for failing to particularly
point out and distinctly claim the subject matter which the Applicant regard as the invention.
Applicants demonstrate below that both the words 'context' and 'shortcut' are definite.

Claims 1, 4-5, 7, 10-11, 13 and 16-17 stand rejected under 35 U.S.C § 103(a) as unpatentable
over Dickman, et al. (U.S. Patent No. 6,091,409) in view of Clark, et al., *et al.* (U.S. Publication
No. 2004/0199529). Applicants claim methods, systems, and products for context aware,
shortcut enabled method of presenting information through a user interface on a client device
that includes, among other elements, 'selecting information records from an information
database in dependence upon a context, a context table name, a shortcut field names, and a
context field name.' The Office Action attempts to equate Clark's disclosure of an email
organizer that allows users to access a single message from multiple message folders with
'selecting information records from an information database in dependence upon the context, the
context table name, the shortcut field names, and the context field name' as claimed in
Applicants independent claims. Clark, however, does not teach the selection of anything in
dependence upon context, the context table name, the shortcut field names, and the context field
name.

<u>DETAILED ANALYSIS:</u>

REJECTIONS – 35 U.S.C. § 112

Claims 1, 7, and 13 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite
for failing to particularly point out and distinctly claim the subject matter which the Applicant
regard as the invention. Paragraph 4 of the Office Action states:

> Claims 1, 7, and 13 are rejected under 35 U.S.C. 112, first paragraph, as failing to
> comply with the written description requirement. The claim(s) contain subject

matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor(s), at the time the application was filed has possession of the claimed invention. The "context" and "shortcut" do not support clearly in the specification. Application are advised to amend the claim in a language that supports in the application specification and helps one of ordinary skills in the art to understand the step of invention.

The words 'context' and 'shortcut,' however, are definite in light of the specification. MPEP § 2173.02 sets forth the standard for compliance with 35 U.S.C. § 112 stating that "…the examiner must consider the claim as a whole to determine whether the claim apprises one of ordinary skill in the art of its scope and, therefore, serves the notice function required by 35 U.S.C. 112, second paragraph, by providing clear warning to others as to what constitutes infringement of the patent." MPEP § 2173 further explains, "Definiteness of claim language must be analyzed, not in a vacuum, but in light of: (A) The content of the particular application disclosure; (B) The teaching of the prior art; and (C) The claim interpretation that would be given by one possessing the ordinary level of skill in the pertinent art at the time the invention was made."

The words 'context' and 'shortcut' specifically mentioned in paragraph 4 of the Office Action properly satisfy the definiteness requirement of 35 U.S.C. § 112, second paragraph, when analyzed in light of the factors from MPEP § 2173 above, including the Applicant's disclosure. Applicants have provided a 26 page specification including 3 pages of Figures to aid those skilled in the art in understanding Applicants claims. Regarding the words 'context' and 'shortcut,' Applicants have specifically provided examples beginning at page 15, lines 25-27, of the specification stating:

> Additional examples illustrate the effect of a change in context on the meaning of a shortcut. In the example shortcut definitions records (316) in Figure 4, there are two shortcuts named "location," one for "time" contexts and on for "contacts" contexts. In this exemplary embodiment, when the context is set to "time" and the shortcut entered by the user is the shortcut for "location," the shortcut fields are the fields storing date, time, street address, city, and state of an appointment or meeting; the context table name is "Calendar," the context field name is "Street Address;" the relational operator is "="; and the context is the first calendar entry in the calendar file. With these inputs, the create function (220) creates a query of the following exemplary form:

>   SELECT Date, Appt_Begin_Time, Street, City, State
>   FROM Calendar
>   WHERE Street = Street Value From First Record In Calendar File

Similarly, when the context is set to "when the context is set to "contacts" and the shortcut entered by the user is the shortcut for "location," that is, the same shortcut as in the example just above, then the shortcut fields are the fields storing last name, first name, street address, city, and state of a contact; the context table name is "Address_Book;" the context field name is "LastName;" the relational operator is "="; and the context is the first calendar entry in the Address_Book file. With these inputs, the create function (220) creates a query of the following exemplary form:

>   SELECT LastName, FirstName, Street, City, State
>   FROM Address_Book
>   WHERE LastName = LastName Value From First Record In
>   Address_Book

These last two examples show that the semantics of a shortcut change with changes in context. In the embodiment illustrated in Figure 3, for example, the shortcut representing "location," changed meaning when the context changed from "time" to "contacts." In the user interface, the shortcut is implemented as a short keystroke combination such as, for example, Alt-L. Alternatively, the shortcut is implemented in the user interface as a custom graffiti shortcut, a few stylus strokes representing "location." The shortcut is implemented in the user interface across embodiments in many ways that will occur to those of skill in the art, all such ways being well within the scope of the present invention.

In the present example, the meaning of the shortcut for "location" changed from context to context. In the "time" context, the semantics for the "location" shortcut are effectively, "Display time and places where the user has or had appointments or meetings." In the "contacts" context, for the exact same shortcut, "location," the semantics changed to, "Display names and addresses of persons known to the user." Thus the meaning of shortcuts changes with context, and the exact same shortcut in various embodiments has many meanings depending upon the number of contexts in which the shortcut is defined.

From only the exemplary excerpt of the specification above, those of ordinary skill in the art will recognize that a 'context' is the situational parameters or characteristics that dictate the semantics of a shortcut according to the present invention. Moreover, from the same exemplary excerpt of the specification, those of ordinary skill in the art will recognize a shortcut as an

abbreviated form of user input such as, for example, a shortcut keystroke or a custom graffiti

shortcut. In view of Applicant's specification, the words 'context' and 'shortcut' are sufficiently

definite to apprise one of ordinary skill in the art of its scope as required by 35 U.S.C. § 112,

second paragraph. The Applicants, therefore, traverse the rejections individually to claims 1, 7,

and 13 under 35 U.S.C. § 112, second paragraph, and respectfully request the withdrawal of the

rejections.

CLAIM REJECTIONS – 35 U.S.C. § 103
OVER DICKMAN IN VIEW OF CLARK

Claims 1, 4-5, 7, 10-11, 13 and 16-17 stand rejected under 35 U.S.C § 103(a) as unpatentable

over Dickman, et al. (U.S. Patent No. 6,091,409) in view of Clark, et al., *et al.* (U.S. Publication

No. 2004/0199529). Applicants respectfully traverse each rejection. To establish a prima facie

case of obviousness, three basic criteria must be met. *Manual of Patent Examining Procedure*

§2142. The first element of a prima facie case of obviousness under 35 U.S.C. § 103 is that there

must be a suggestion or motivation to combine the references. *In re Vaeck*, 947 F.2d 488, 493, 20

USPQ2d 1438, 1442 (Fed. Cir. 1991). The second element of a prima facie case of obviousness

under 35 U.S.C. § 103 is that there must be a reasonable expectation of success in the proposed

combination of the references. *In re Merck & Co., Inc.,* 800 F.2d 1091, 1097, 231 USPQ 375,

379 (Fed. Cir. 1986). The third element of a prima facie case of obviousness under 35 U.S.C. §

103 is that the proposed combination of the references must teach or suggest all of Applicants'

claim limitations. *In re Royka*, 490 F.2d 981, 985, 180 USPQ 580, 583 (CCPA 1974).

The Proposed Combination Of Dickman And
Clark Does Not Teach All Of Applicants' Claim Limitation

To establish a prima facie case of obviousness, the proposed combination of Dickman, et al. and

Clark, et al must disclose all of the Applicants' claim limitations. *In re Royka,* 490 F.2d 981,

985, 180 USPQ 580, 583 (CCPA 1974). Independent claim 1 of the present application claims:

1.   A context aware, shortcut enabled method of presenting information through a user interface on a client device, the method comprising the steps of:

selecting a context;

receiving a shortcut entered through the user interface, the shortcut having associated with it a shortcut field name set comprising one or more shortcut field names;

inferring from a context definition table, in dependence upon the context, a context table name and a context field name;

selecting information records from an information database in dependence upon the context, the context table name, the shortcut field names, and the context field name; and

displaying selected records through the user interface on the client device.

Neither Dickman Nor Clark Disclose Or Suggest Selecting Information Records From An Information Database In Dependence Upon The Context, The Context Table Name, The Shortcut Field names, And The Context Field Name

The fourth element of claim 1 claims 'selecting information records from an information database in dependence upon the context, the context table name, the shortcut field names, and the context field name....' Regarding the fourth element, in the present Office Action, the Examiner at page 5 admits that Dickman does not disclose the fourth element of claim 1, stating:

> Dickman does not clearly teach the shortcut having a associated with it a shortcut field name set comprising on or more shortcut field names; and selecting information records from an information database in dependence upon the

context, the context table name, the shortcut field name and the context field name.

The Office Action at page 5 goes on to state regarding Clark:

> However, Clark teaches a shortcut table or data store or a data structure where each of the messages or records to be stored (item 57 in fig. 5A; sections 0062 and 0114-0118). Each record has its ID, field name. This database is searchable based on the message ID and the result is to be displayed to user (abstract and fig. 6 and sections 0082-0085).

That is, the Office Action takes the position that Clark at abstract, Figure 6, reference number 57 in Figure 5A, and paragraphs 0062, 0082-0085, and 0114-0118 disclose the fourth element of claim 1. Applicants respectfully note in response, however, that what Clark at Abstract in fact discloses is:

> A computer-based system catalogs and retrieves electronic messages saved in a message store. The system automatically organizes each saved message into multiple folders based on the contents and attributes of the message, and implements improved methods for manually organizing messages. Unlike prior art systems, where a message exists in only one folder, the system uses lightweight message shortcuts to display the message in multiple folders simultaneously. The system preferably permits messages to be organized by: 1) basic message and attachment properties, e.g. date, status, attachment type; 2) extended message properties that the user can specify, e.g. keywords; and 3) correspondent or bulk mail sender/recipient, with automatic separation of bulk mail from correspondence. Performance and usability are improved by performing reads incrementally and by providing multiple sorting keys.

That is, Clark at the Abstract discloses a computer-based system which catalogs and retrieves electronic messages saved in a message store. Clark's computer-based system fails to teach, show, or suggest selecting information records from an information database in dependence upon the context, the context table name, the shortcut field names, and the context field name as claimed in the present application. The computer-based system of Clark is an email organizer that allows users to access a single message from multiple message folders and has nothing to do with shortcuts whose semantics are dictated by context. As such, Clark does not disclose selecting information records from an information database in dependence upon the context, the context table name, the shortcut field names, and the context field name. In fact, Clark at the

Abstract does not even mention 'context,' 'context table name,' 'shortcut field names,' 'context field name,' or 'selecting information records from an information database in dependence upon the context, the context table name, the shortcut field names, and the context field name.' Because the Clark does not teach or suggest all the limitations of Applicant's claims, the Office Action has not established a prima facie case of obviousness, and the rejections should be withdrawn.

Turning now to Clark at Figure 6, Applicants respectfully note in response that what Clark at Figure 6 in fact discloses is a user interface for use with Clark's system for managing and organizing stored electronic messages. Clark's user interface is clearly not selecting information records from an information database in dependence upon the context, the context table name, the shortcut field names, and the context field name as claimed in the present application. The user interface of Clark is a user interface that allows users to access a single message from multiple message folders and has nothing to do with shortcuts whose semantics are dictated by context. As such, Clark does not disclose selecting information records from an information database in dependence upon the context, the context table name, the shortcut field names, and the context field name. In fact, Clark's user interface does not even contain a 'context table name,' 'shortcut field names,' or 'context field name.' Because the Clark does not teach or suggest all the limitations of Applicant's claims, the Office Action has not established a prima facie case of obviousness, and the rejections should be withdrawn.

Turning now to Clark at reference number 57 in Figure 5A, Applicants respectfully note in response that what Clark at Figure 5A in fact discloses is a shortcut table that includes a 'MessageID' field, 'AttachID' field, and 'FolderID' field. Clark's shortcut table is clearly not selecting information records from an information database in dependence upon the context, the context table name, the shortcut field names, and the context field name as claimed in the present application. The shortcut table of Clark is data structure useful in an email organizer that allows users to access a single message from multiple message folders and has nothing to do with shortcuts whose semantics are dictated by context. As such, Clark does not disclose selecting

information records from an information database in dependence upon the context, the context

table name, the shortcut field names, and the context field name. In fact, Clark's shortcut table

does not include fields for 'context table name,' 'shortcut field names,' or 'context field name.'

Because the Clark does not teach or suggest all the limitations of Applicant's claims, the Office

Action has not established a prima facie case of obviousness, and the rejections should be

withdrawn.

Turning now to Clark at paragraph 0062, Applicants respectfully note in response that what

Clark at paragraph 0062 in fact discloses is:

> FIG. 1B shows a schematic overview of the invention. A data store 11 accessible
> to a processor 13 contains a plurality of messages A, B, C. Processor 13 executes
> instructions which cause it to create one or more shortcuts 19 to each of the
> messages in the data store 11. Data store 11 may comprise a single physical
> device, may comprise a distributed data store spread over two or more physical
> devices. Data store 11 may be a single logical device or may comprise multiple
> logical devices. Each shortcut 19 is associated with a folder. In FIG. 1B,
> horizontally aligned shortcuts 19 are in the same folder. A user interface 15
> equipped with a suitable input device 17 permits a user to select a folder and to
> view and manipulate messages which have shortcuts in the selected folder. The
> shortcuts have properties which permit large numbers of messages to be
> effectively handled so that users do not experience unacceptable delays in sorting
> contents of folders in various ways or while waiting for the contents of a folder to
> be displayed in interface 15

That is, Clark at paragraph 0062 discloses creating a shortcut to a message in a database and

associating the shortcut with a folder to permit a user to access the message from multiple

folders. Clark's creating a shortcut to a message in a database and associating the shortcut with a

folder to permit a user to access the message from multiple folders is clearly not selecting

information records from an information database in dependence upon the context, the context

table name, the shortcut field names, and the context field name as claimed in the present

application. The shortcut and folder of Clark are components in an email organizer that allows

users to access a single message from multiple message folders and has nothing to do with

shortcuts whose semantics are dictated by context. As such, Clark does not disclose selecting

information records from an information database in dependence upon the context, the context

table name, the shortcut field names, and the context field name. In fact, Clark at paragraph

0062 does not even mention 'context,' 'context table name,' 'shortcut field names,' 'context field

name,' or 'selecting information records from an information database in dependence upon the

context, the context table name, the shortcut field names, and the context field name.' Because

the Clark does not teach or suggest all the limitations of Applicant's claims, the Office Action

has not established a prima facie case of obviousness, and the rejections should be withdrawn.

Turning now to Clark at paragraphs 0082-0085, Applicants respectfully note in response that

what Clark at paragraphs 0082-0085 in fact discloses is a description of a user interface of an

email organizer that allows users to access a single message from a variety of message folders.

Clark's description of a user interface of an email organizer is not selecting information records

from an information database in dependence upon the context, the context table name, the

shortcut field names, and the context field name as claimed in the present application. Clark at

paragraphs 0082-0085 merely describes a user interface and does not even mention 'context,'

'context table name,' 'shortcut field names,' 'context field name,' or 'selecting information

records from an information database in dependence upon the context, the context table name,

the shortcut field names, and the context field name.' Because the Clark does not teach or

suggest all the limitations of Applicant's claims, the Office Action has not established a prima

facie case of obviousness, and the rejections should be withdrawn.

Turning now to Clark at paragraphs 0114-0118, Applicants respectfully note in response that

what Clark at paragraphs 0114-0118 in fact discloses is:

> Shortcut table 57 is a database structure which is used to provide lightweight
> message shortcuts. Each row in shortcut table 57 associates a MessageSummary
> or an AttachSummary with a folder 38. A single MessageSummary or
> AttachSummary may be simultaneously associated with many folders 38.
>
> The PrimaryKey for shortcut table 57 is MessageId+AttachId+FolderId- . This
> key uniquely identifies a shortcut. This key also permits the association of
> multiple shortcuts with a single MessageSummary row by means of the
> MessageSummary table's PrimaryKey (MessageId). This key also permits the

> association of multiple shortcuts with a single AttachSummary row by means of the AttachSummary table's PrimaryKey (MessageId+AttachId).
>
> AlternateKey1 for shortcut table 57 is FolderId+SortKey. This key permits the association of multiple shortcuts with a folder by means of the folder table's PrimaryKey (FolderId). This key is also used to sort and read the shortcuts in a folder. Duplicates are allowed.
>
> AlternateKey2 for shortcut table 57 is TriggerDateTime. This key is used to implement timed shortcuts that cause an action to be executed when the TriggerDateTime is reached. The key is not populated if TriggerDateTime is zero. Duplicates are allowed.
>
> In this preferred embodiment of the invention, the structure of shortcut table 57 does not permit multiple shortcuts for the same message to be associated with a single folder. Rather, each shortcut associated with a message must appear in a separate folder.

That is, Clark at paragraphs 0114-0118 discloses an entity-relationship diagram of the data structures used to allow users to access a single message from a variety of message folders. Clark's entity-relationship diagram of the data structures used to allow users to access a single message from a variety of message folders is not selecting information records from an information database in dependence upon the context, the context table name, the shortcut field names, and the context field name as claimed in the present application. The entity-relationship diagram of Clark depicts data structures of an email organizer that allows users to access a single message from multiple message folders and has nothing to do with shortcuts whose semantics are dictated by context. As such, Clark does not disclose selecting information records from an information database in dependence upon the context, the context table name, the shortcut field names, and the context field name. In fact, Clark at paragraphs 0114-0118 does not even mention 'context,' 'context table name,' 'shortcut field names,' 'context field name,' or 'selecting information records from an information database in dependence upon the context, the context table name, the shortcut field names, and the context field name.' Because the Clark does not teach or suggest all the limitations of Applicant's claims, the Office Action has not established a prima facie case of obviousness, and the rejections should be withdrawn.

Relations Among Claims

Independent claim 1 claims method aspects of a context aware, shortcut enabled method of presenting information through a user interface on a client device according to embodiments of the present invention. Independent claims 7 and 13 respectively claim system and computer program product aspects of a context aware, shortcut enabled method of presenting information through a user interface on a client device according to embodiments of the present invention. Claim 1 is allowable for the reasons set forth above. Claims 7 and 13 are allowable for at least those reasons given for the allowability of claim 1. The rejections of claims 7 and 13 therefore should be withdrawn, and claims 7 and 13 should be allowed.

Claims 4-5, 10-11, and 16-17 depend respectively from independent claims 1, 7, and 13. Each dependent claim includes all of the limitations of the independent claim from which it depends. Because the combination of Dickman and Clark does not disclose or suggest each and every element of the independent claims, so also the combination of Dickman and Clark cannot possibly disclose or suggest each and every element of any dependent claim. The rejections of Claims 4-5, 10-11, and 16-17 therefore should be withdrawn, and these claims also should be allowed.

In addition to the elements and limitations of the independent claims, the dependent claims 4-5, 10-11, and 16-17, also include such limitations as 'receiving a context from the client device, the context entered by a user through the user interface,' and 'wherein the context has an initial context value, and the method comprises the further steps of: assigning, in response to user input through the user interface, a new context value to the context; and repeating, in response to user input from the user interface, the steps of assigning a new context value to the context, inferring a context table name and a context field name, selecting records, and downloading selected records.' The proposed combination of Dickman and Clark not only does not disclose the elements of the independent claims, but Dickman and Clark do not disclose these additional elements. The rejections of claims 4-5, 10-11, and 16-17, therefore, should be withdrawn, and these claims also should be allowed.

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CLAIM REJECTIONS – 35 U.S.C. § 103 OVER DICKMAN
IN VIEW OF CLARK IN FURTHER VIEW OF RUBIN

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Claims 2-3, 6, 8-9, 12, 14-15, and 18 stand rejected under 35 U.S.C § 103(a) as unpatentable over Dickman, et al. (U.S. Patent No. 6,091,409) in view of Clark, et al., *et al.* (U.S. Publication No. 2004/0199529) in further view of Rubin, *et al.* (U.S. Publication No. 2004/0233235). To establish a prima facie case of obviousness, the proposed combination of Dickman, Clark, and Rubin must teach or suggest all of the claim limitations of dependent claims 2-3, 6, 8-9, 12, 14-15, and 18. *In re Royka*, 490 F.2d 981, 985, 180 USPQ 580, 583 (CCPA 1974). The Office Action relies on the previous 35 U.S.C. § 103 rejection above to reject claims 2-3, 6, 8-9, 12, 14-15, and 18. As Applicants have demonstrated above, the combination of Dickman and Clark does not disclose each and every element of independent claims 1, 7, and 13. Dependent claims 2-3, 6, 8-9, 12, 14-15, and 18 depend from independent claims 1, 7, and 13 and include all of the limitations of the claim from which each dependent claim depends. Because the rejections using the proposed combination of Dickman, Clark, and Rubin rely on the argument that the combination of Dickman and Clark discloses each and every element claims 1, 7, and 13, and because the combination of Dickman and Clark does not disclose each and every element claims 1, 7, and 7, the proposed combination of Dickman, Clark, and Rubin cannot teach or suggest all the claim limitations of claims 2-3, 6, 8-9, 12, 14-15, and 18. The proposed combination of Dickman, Clark, and Rubin, therefore, cannot establish a prima facie case of obviousness, and the rejections should be withdrawn.

In addition to the elements and limitations of the independent claims, the dependent claims 2-3, 6, 8-9, 12, 14-15, and 18, also include such limitations as 'creating a query, wherein the query includes: the context table name as a table for the query; the shortcut field names as field names for the query; and the context and the context field name in a condition for the query,' 'selecting a default context,' and 'selecting a display form in dependence upon the shortcut value, wherein displaying selected records through the user interface on the client device further comprises downloading the selected records to the client device for display in the display form.' The

proposed combination of Dickman, Clark, and Rubin not only does not disclose the elements of the independent claims, but Dickman, Clark, and Rubin do not disclose these additional elements. The rejections of claims 2-3, 6, 8-9, 12, 14-15, and 18, therefore, should be withdrawn, and these claims also should be allowed.

CONCLUSION

Claims 1, 7, and 13 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which the Applicant regard as the invention. For the reason explained above, however, the Applicants claims are sufficiently definite to apprise one of ordinary skill in the art of its scope as required by 35 U.S.C. § 112, second paragraph. The rejections of clam 1, 7, and 13 should, therefore, be withdrawn. Reconsideration of claims 1, 7, and 13 in light of the present remarks is respectfully requested.

Claims 1, 4-5, 7, 10-11, 13 and 16-17 stand rejected under 35 U.S.C § 103(a) as unpatentable over Dickman, et al. (U.S. Patent No. 6,091,409) in view of Clark, et al., *et al.* (U.S. Publication No. 2004/0199529). For the reasons set forth above, however, the proposed combination of Dickman and Clark fails to establish a prima face case of obviousness. The rejection of claims 1, 4-5, 7, 10-11, 13 and 16-17 should therefore be withdrawn, and the claims should be allowed. Reconsideration of claims 1, 4-5, 7, 10-11, 13 and 16-17 in light of the present remarks is respectfully requested.

Claims 2-3, 6, 8-9, 12, 14-15, and 18 stand rejected under 35 U.S.C § 103(a) as unpatentable over Dickman, et al. (U.S. Patent No. 6,091,409) in view of Clark, et al., *et al.* (U.S. Publication No. 2004/0199529) in further view of Rubin, *et al.* (U.S. Publication No. 2004/0233235). For the reasons set forth above, however, the proposed combination of Dickman, Clark, and Rubin fails to establish a prima face case of obviousness. The rejection of claims 2-3, 6, 8-9, 12, 14-15,
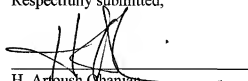
and 18 should therefore be withdrawn, and the claims should be allowed. Reconsideration of claims 2-3, 6, 8-9, 12, 14-15, and 18 in light of the present remarks is respectfully requested.

The Commissioner is hereby authorized to charge or credit Deposit Account No. 09-0447 for any fees required or overpaid.

Respectfully submitted,

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